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July 16, 2025

BY ECF

Hon. Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Jacob Walden, 24 CR 521 (GRB)

Dear Judge Brown:

I am writing on behalf of defendant Jacob Walden to respectfully apprise the Court as to witness availability and scheduling with regard to Mr. Walden's upcoming suppression hearing. At present, the government has indicated that it plans to call SA Christopher Moriarty for the hearing; the defense has requested §3500 material for SA Moriarty and awaits its production. Additionally, the defense has notified the government that it intends to call SA Jaclyn Duchene, who provided affidavits in support of the government's requests for both Mr. Walden's arrest warrant, and the warrant to search the cellphone seized from him while leaving the country, some fifteen weeks prior to the warrant's issuance.

The government has been helpful in facilitating witness production and has indicated that while SA Duchene is unavailable on July 25, all parties, including both witnesses, are available on August 25 and September 4. Should the Court have availability on either of those dates, the parties believe that the testimony of both witnesses can be completed in less than one day – and for the sake of efficiency, this is a preferable course of action for the defense and the government. In the meantime, the defense will continue to review discovery, much of which must be reviewed in person at HSI in New Jersey, and the parties will work towards a resolution of the case.

Finally, the defendant consents to the exclusion of time under the Speedy Trial Act between July 25, 2025 and the date of this hearing, should it be rescheduled, pursuant to 18 U.S.C. § 3161(h)(7)(A).

JEFFREY LICHTMAN

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Thank you for the Court's consideration of this application; I remain available for a conference on the matter should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Leonid Sandlar, Esq.
Assistant United States Attorney (by ECF)